

## Website Privacy Policy

This website <https://pbgb.d2c.seic.com> (the “**Site**”) provides a portal, or gateway, to the investment services offered by HSBC Private Bank (UK) Limited. HSBC Private Bank (UK) Limited is a public limited company registered in England and Wales under Company Register Number 499482 and with its registered office at 8 Canada Square, London, E14 5HQ, UK. For the purpose of the Data Protection Act 1998 (the “**Act**”), the data controller is HSBC Private Bank (UK) Limited (‘**we**’, ‘**us**’ and ‘**our**’).

We recognise the importance of respecting your information and maintaining its confidentiality. This policy (together with the Site Terms and Conditions and any other documents referred to in it) sets out how we collect and process your information in connection with the Site (the “**Privacy Policy**”). Please read the following carefully to understand our practices regarding your information and how we will treat it.

This Privacy Policy does not apply to the information that we collect in connection with our investment services. Our Investment Services Terms and Conditions (as varied, supplemented or replaced at any time) set out how we collect and process your information in that context and, where relevant, those provisions apply equally to information collected in connection with the Site. To the extent that there is any conflict between the Investment Services Terms and Conditions and this Privacy Policy, the terms of the Investment Services Terms and Conditions will take priority. If you require a further copy of our Investment Services Terms and Conditions, please contact your Relationship Manager.

### Information we may collect about you

We may collect information in order to provide you with access to the Site and in order to verify you are authorised to do so. We may also collect information during your visit, including the pages you view, the links you click and other actions taken in connection with the Site. We also collect certain standard information that your Web browser sends to every website you visit, such as your IP address, browser type, access times and referring website addresses. In addition, if you wish to receive information from us, you will be asked to provide personal information, such as your email address, name, address and telephone number. We may also collect demographic information, such as your post code, preferences and interests. We have ensured that third parties with whom we contract to assist us in providing services have agreed to maintain the confidentiality of your data and process your information in line with the instructions that we give them. .

### How we process your information

We process your information in the following ways:

- to ensure you are authorised to access the Site in accordance with the Site Terms and Conditions;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer (or mobile device), including by eliminating the need for you to repeatedly enter the same information and displaying content customised to your interests and preferences;
- to perform research and analysis aimed at improving our services;
- to provide you with products, services or information that you request from us or to carry out our obligations arising from any contracts entered into between you and us;
- to provide you with information on products and services that we feel may interest you (by post, telephone, email or text message), where you have consented to be contacted for such purposes;
- to allow you to participate in any interactive features of our Site, when you choose to do so; and

- to notify you about changes to our Site.

We are committed to safeguarding your data and maintaining your privacy online and we do not sell your information to third parties, unless we have your prior written consent.

### **Disclosure of your information**

We may disclose your information to third parties in the following situations:

- In the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets.
- If HSBC Private Bank (UK) Limited or substantially all of its assets are acquired by a third party, in which case your information may be one of the transferred assets.
- In order to comply with any legal or regulatory obligation or request.
- In order to enforce or apply our Site Terms and Conditions and other agreements or to protect the rights, property, or safety of the HSBC Group, HSBC Group members, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and in connection with financial crime risk management.

### **Where we store your information**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ('**EEA**'). The data may also be processed by staff operating outside of the EEA who work for us, HSBC Group, HSBC Group members or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

### **Security**

We are committed to protecting the security of your information. A variety of security technologies and procedures are used to protect your information from unauthorised access, use, or disclosure.

We maintain strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including our staff. We use leading technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data. HSBC Group, all HSBC Group members, all our staff and third parties whenever we hire them to provide support services, are required to observe our privacy standards and to allow us to audit them for compliance.

We welcome online feedback and we provide various services whereby users of the Site can provide feedback, such as but not limited to comments. Any communication transmitted to us via a public forum or other means, such as a publicly accessible comment to any website or social networking site ("**Submission**") is understood by both parties to be non-confidential and non-proprietary. We have no obligation with respect to any Submission and may freely copy, reproduce, incorporate, distribute, or use such Submission as it wishes. Submissions that are violent, obscene, threatening, defamatory, libellous, or violate the law in any way, are prohibited.

### **Your rights**

You have the right to object to your information being processed, which includes the right to ask us not to process your information for marketing purposes. You can also exercise your right to prevent or stop your information being processed for marketing purposes by checking certain boxes on the forms we use to collect your data and by contacting us.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates ('**Third Party Sites**'). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit your information to these Third Party Sites.

### **Access to your information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

### **Changes to our Privacy Policy**

We may change the content or services found on our Site at any time without notice, and consequently our Privacy Policy may change at any time in the future. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

### **Contact**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed via the Contact us form.

We provide financial products and services through our affiliated companies and branches located worldwide. Privacy and data protection principles vary from one country to another. When you access or link to any other website, please read the privacy and data protection statements or agreements issued by such other website to determine the policies that apply to information or data maintained by that website.

## **Cookie Policy**

### **Understanding how and why we use cookies**

We use cookies to give you the best possible experience on our website. Cookies allow you to do many things such as log on to Internet Banking and have us 'remember' your log-in preferences.

When you visit this site, we ask for your consent to use cookies. However, this Cookie Policy allows you to amend your preference for tailored content cookies.

To find out more about how we use cookies and what benefits they bring, please take a few moments to read this Cookie Policy.

### **Frequently asked questions**

#### **What are cookies?**

Cookies are small text files that are sent to and stored on your computer, smartphone or other device for accessing the internet, whenever you visit a website. Cookies are useful because they allow a website to recognise a user's device.

At HSBC, we use cookies for a variety of reasons, such as to determine preferences, let users navigate between pages efficiently, verify the user and carry out other essential security checks.

Some of the functions that cookies perform can also be achieved using similar technologies. This policy refers to 'cookies' throughout, however it also covers these alternate mechanisms.

More information about cookies can be found on [allaboutcookies.org](http://allaboutcookies.org).

### **How cookies make our website safer and easier to use**

We use cookies to safeguard your privacy when you're browsing our website. If you leave a secure session window open when logged in to Internet Banking, we use cookies to enhance your security by prompting you to end (or automatically ending) your secure session.

Finally, we use 'analytics' cookies to help us make our website better for those who visit it regularly. They help us work out what users like and don't like and how we can improve things for you.

When we include links to other websites, please bear in mind they will have their own privacy and cookie policies that will govern the use of any information you submit. We recommend you read their policies as HSBC is not responsible or liable for their privacy practices.

### **Do cookies mean I could get cold calls or junk mail?**

We never use the data gathered through cookies to contact you via post, email or phone. You will never see advertising on our website from anyone other than HSBC group companies and our agents.

### **Can cookies pass on my personal information to others?**

The only time we may use cookies to share personal information such as your name, address, telephone or email is when you have given us express consent to do so by applying for a product or service. For example, if you were applying for a home insurance policy, we'd inform you that we'd be passing your details to our trusted home insurance policy provider.

### **Do cookies compromise my security when I'm logged on to Internet Banking?**

The cookies we use are completely safe. In fact, many of them are used purely to provide important security features such as protecting your data and your accounts.

### **Can cookies allow others access to my computer's hard drive?**

The cookies we use cannot look into your computer, smartphone or web-enabled device and obtain information about you or your family or read any material kept on your hard drive.

### **If I use a public computer, will someone be able to get my details from the cookies?**

Our cookies cannot be used by anyone else who has access to the computer to find out anything about you, other than the fact that someone using the computer may have visited a certain website. Our cookies do not in any way compromise the security of Internet Banking.

### **Why are cookies required to log on to Internet Banking?**

To ensure we can provide suitable content to meet our customers' needs, all cookies have to be enabled if you want to access Internet Banking.

### **Why can't I amend my cookie preferences when I'm logged on to Internet Banking?**

All cookies have to be enabled if you want to access Internet Banking. You can amend your preferences after you have logged off if you wish but we will ask for your consent to enable all cookies when you log on again.

### Can I opt-out of HSBC advertisements I see on other websites?

There are two types of HSBC adverts shown on other companies' websites. The first are general campaign-related adverts that are not targeted based on your browsing behaviour, from which you cannot opt out. The second are targeted adverts which are being shown to you because of your likely interests based upon previous web browsing activity. These can be easily identified as they feature a small blue AdChoices icon in the corner of the advert.

To disable all targeted adverts from HSBC, please visit [Your Online Choices](#) where you will be able to opt out of the Microsoft Advertising network. Please note, by opting out of Microsoft Advertising, this will disable targeted adverts for HSBC and any other companies that use this network. For further details, please visit the [Your AdChoices](#) website.

### Can I opt-out of all cookies?

If you wish to opt out of all cookies for this website and any other website, you can do this through your browser settings. Your browser's 'help' function will tell you how to do this.

However, please remember that cookies are often used to enable and improve certain functions on our website. If you choose to switch certain cookies off, it is likely to affect how our website works. For example, if your browser is set to disable 'session' cookies, although you will still be able to view our public website, you won't be able to log on to Internet Banking.

More information about how to disable cookies, visit [allaboutcookies.org](http://allaboutcookies.org)

### Can I manage cookies with JavaScript disabled?

JavaScript is required to manage your cookie preferences. If your browser has JavaScript disabled, tailored content cookies will be disabled too. To manage your cookie preferences and experience an optimised version of our website, make sure your browser has JavaScript enabled. Depending on which browser you're using, this function is usually found under 'tools', 'options' or 'preferences'.

### Cookies used by this site

Cookie Name	Purpose	Type	Essential
<b>How Google uses data when you use sites or apps:</b> <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>			
_utma	This cookie keeps track of the number of times a visitor has been to the site pertaining to the cookie, as well as information about when their first visit was, and when their last visit occurred. Google Analytics uses the information from this cookie to, for example, calculate days and visits to purchase. All data is anonymous.	Persistent	No
__utmb	The __utmb cookie and the __utmc listed below are "brothers", working together to calculate how long a visit takes. __utmb takes a timestamp of the exact moment in time when a visitor enters a site, while __utmc takes a timestamp of the exact moment in time when a visitor leaves a site. __utmb expires at the end of the session. __utmc expires 30 minutes, later. This delayed expiry is attributable to the cookies' inability to recognise when a user closes their browser or, alternatively, leaves a website. The cookies can be said to wait 30 minutes for another pageview to happen, and if it does not, it	Session	No

Cookie Name	Purpose	Type	Essential
	expires.		
__utmc	The __utmc cookie and the __utmb listed above are “brothers”, working together to calculate how long a visit takes. __utmb takes a timestamp of the exact moment in time when a visitor enters a site, while __utmc takes a timestamp of the exact moment in time when a visitor leaves a site. __utmb expires at the end of the session. __utmc expires 30 minutes, later. This delayed expiry is attributable to the cookies’ inability to recognise when a user closes their browser or, alternatively, leaves a website. The cookies can be said to wait 30 minutes for another pageview to happen, and if it does not, it expires.	Session plus 30 minutes	No
__utmz	The __utmz cookie allows HSBC to ascertain where the visitor came from, what search engine was used, what link the user clicked on, what keyword was used, and from where in the world one of our websites was accessed. It expires in 15,768,000 seconds – or, in 6 months. This cookie is how Google Analytics knows to whom and to what source / medium / keyword to assign the credit for a Goal Conversion or an Ecommerce Transaction.	Expiring	No
<b>Other Cookies</b>			
Terms and conditions acceptance in form	Persistent cookie stored when user accepts terms and conditions from login enrolment process. During login, the system collects certain device characteristics and store the information encrypted in a cookie. User will be challenged to answer 2 security questions if the device characteristics do not match at least 60% with the previously collected information	Persistent	Yes
Machine Fingerprint (MFP / DeviceID component) in form	Persistent cookie stored after successfully registering the device. This cookie contains encrypted private/public key of the user. This key pair is used for password verification. If this cookie gets deleted, user will be challenged to answer 2 security questions.	Persistent	Yes
MFA Workflow (Arcot) ID ArcotAuthDid=<alpha string>	Persistent cookie stored after user successfully logged into site after registering their device.	Persistent	Yes

### Where can I find out more about cookies?

More information about cookies can be found on [allaboutcookies.org](http://allaboutcookies.org)

### More about your privacy

To find out more about how HSBC protects your privacy when using our website, see our Site Terms and Conditions and Privacy Statement.